



**King County  
International Airport**

Department of  
Construction & Facilities Management

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June 22, 1999

Gary Zarker, Superintendent  
Seattle City Light  
700 Fifth Avenue, Suite 3100  
Seattle, Washington 98104-5031

Dear Gary:

Thank you for taking the time to meet on June 7 to discuss the Georgetown Steam Plant and how we might proceed on the items before us. It was very helpful to hear directly from you regarding City Light's needs so that we can move ahead most effectively. Per our agreement at the meeting that I should send you a proposal for how to proceed, the following outlines our suggestions.

**Environmental Impact Statement and Section 106 Process**

The Airport's Master Plan consultant is working on an environmental impact statement for the Master Plan's preferred alternative, which includes the runway shift 800 feet to the north. There will be specific, project-level analysis of the proposed runway shift, including noise and vibration analysis of possible impacts to the Steam Plant, and an inventory of all sites currently listed on or potentially eligible for the National Register of Historic Places in the vicinity of the Airport. After this initial inventory is completed, the consultant will coordinate with City Light, as well as other agencies interested in historic preservation, to have the inventory results reviewed, discuss site eligibility for the National Register, and locations for additional noise monitoring for those sites, if necessary.

The consultant is preparing the modeled noise contours showing the 65 dB DNL noise contour, which will be first reviewed with City Light and other agency participants, and then used to direct the inventory process. The noise and vibration analysis will begin after the contours are developed, and the consultant will meet with City Light staff to review the proposed methodology for the analysis. These analyses will provide the information to determine what impact, if any, the preferred alternative would have on the Steam Plant or other historic structures. The Airport will then seek a determination from the Advisory Council on Historic Preservation and the State Historic Preservation Office concerning the effect of the proposed Airport Master Plan. If a determination of adverse effect is made, the Airport would follow U.S. 36 CFR Part 800 procedures, which includes further consultation and development of a memorandum of agreement concerning how to proceed.

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### **Painting of the Building**

As demonstrated on the map at our meeting, the Steam Plant is located almost entirely within the runway protection zone (RPZ), which is an area established at the end of each runway to enhance the protection of people and property on the ground (FAA Advisory Circular 150/5300-13). This is achieved by clearing RPZ areas of incompatible objects and activities. The Steam Plant, because of its size, also is an obstruction to airspace, since it penetrates beyond what is allowed for aircraft on approach to King County Airport (KCIA), as per Federal Aviation Regulation (FAR) Part 77. As an airport certificated under FAR Part 139, KCIA is required to meet all applicable federal regulations, including compliance with all advisory circulars.

Since the Airport is not proposing that the Steam Plant be removed, it should be marked and lit appropriately to reduce the risk it poses to aircraft. The nearby large Boeing hangar is checkered orange and white on the approach (north) side. Our recommendation is to paint the Steam Plant in the same manner. As a former industrial facility, this should not present a problem; however, because of its status as a historic landmark, there may be issues that arise from making any change to the building's exterior. I have directed a consultant from our Master Plan team to research these possible issues, and if a Section 106 consultation is called for, in light of the building's historic landmark designation, we will provide you that information when we receive it.

### **Access to the Building**

The existing legal access to the Steam Plant is via an easement on 13<sup>th</sup> Street from E. Albro Place. This route currently goes directly through the Airport RPZ, which creates a safety and security issue for the Airport. The roadway should not be fenced off because it is inside the RPZ; a fence would create an additional obstruction. However, at present any traffic can access the airport operational area once through the gate.

The Airport proposes to provide new, unrestricted access to the Steam Plant via a road constructed at Airport expense, approaching the Plant directly from Ellis Avenue. A preliminary drawing is attached. This access would be dedicated to and controlled by City Light or its tenants, would remove any traffic having to travel through the RPZ, and would enhance safety to aircraft on approach. Conversations with City Light staff have referenced an underground structure immediately west of the Steam Plant, which may impact constructing a road of appropriately load-bearing capacity onto Steam Plant property, as shown in the drawing. I request that City Light provide whatever information it may have regarding that area, so that it can be analyzed in the further consideration of this proposal. I have also directed our Master Plan update consultants to research possible issues and impacts from construction near the building monument on the west side and if a Section 106 consultation is called for, in light of the building's historic landmark designation. We will provide you with that information about this when it is available.

### **Proposed Expansion of Steam Plant Property**

Although City Light staff have expressed an interest in possibly leasing property north of the Steam Plant in order to provide vehicle parking, the Airport must accommodate current tenants, including a county agency, who wish to continue leasing that land. Ensuring that City Light has appropriate and safe access to the Steam Plant property, while meeting federal regulations to limit activity in the RPZ, is a separate issue from any possible expansion proposal. At this time, parcels northwest of the Steam Plant are not available for lease.

### **Fencing the Property**

In order to comply with federal regulations and to meet security requirements, KCIA will be constructing a fence on Airport property, at Airport expense, around the Airport boundaries. This will restrict any unauthorized access to the airport operational area. Since the Steam Plant's property is immediately adjacent to a major taxiway and the operational area, the area the Airport will be fencing includes along the east boundary of the Steam Plant property. A survey will be done prior to fencing to establish correct property lines, and City Light staff will be notified before the survey begins and provided a drawing showing the fence lines and gate locations. The gates will be sufficiently wide to meet all Steam Plant equipment access needs.

As part of the process of preparing to survey the property within the KCIA fencing project, an adjustment was discovered which should be made to the drawings showing the City's property boundary. A copy of a preliminary drawing is attached, which shows a slight increase in the property boundary to the northwest of the current boundary. This change will be shown on the map we will be sending you.

### **Recreation Outside the Building/Alterations within the Building**

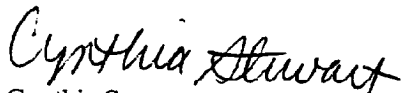
Based on discussions with your staff, it appears that future plans for the Steam Plant may include amenities outside the Plant such as picnic tables and places of public gathering. The Airport would strongly advise against such a development, as it increases risk to people who are gathered within the RPZ. The RPZ designation is to protect people on the ground who are in close proximity to the runway. Any place of public assembly is counter to the safety goal of reducing peoples' exposure to a possible aircraft accident. Also, any activity that might generate litter, such as picnicking, may greatly increase risk to aircraft. Litter blown onto the airfield can be sucked into an aircraft engine. The safety concerns posted by foreign objects and debris, commonly known as FOD, are taken very seriously by the FAA and the Airport; Airport staff are required by FAA regulations to patrol for this type of litter several times a day, and activities near the Airport active areas are generally restricted to those not likely to generate additional FOD. Please be advised that additional FOD generated by Steam Plant property activities may result in additional costs to the City.

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I look forward to your comments on the above items, and to receiving information about possible structures under ground on the west or north sides of the Steam Plant. We will provide you with further information about the need to pursue any study or action, including a Section 106 consultation, associated with the Steam Plant's historic landmark designation when we receive direction from our consultant and from conversations with the State Historic Preservation Office.

Again, thank you for your time and willingness to meet on these important issues.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Stewart".

Cynthia Stewart  
Airport Manager

cc: Ron Sims, King County Executive